**JANUARY 19, 2016**
ELECTRONIC CORRESPONDENCE
michael.oneill@pw.utc.com

**NOTICE OF AIR CONSTRUCTION PERMIT**

United Technologies Corporation
17900 Beeline Highway (SR-710)
Jupiter, FL 33478

**Air Permit No.:** 0990021-046-AC
**Project:** Revision of Permit 0990021-020-AC to modify the monitoring frequency and record keeping requirements for HAPs and VOCs.
**PALM BEACH COUNTY, FLORIDA**

*Authorized Representative:*
Michael O'Neill, Manager
Assembly, Instrumentation, & Test Operations

**Dear Mr. O'Neill:**

Enclosed is the above referenced air pollution construction permit to perform the proposed work on a source of air pollution located in Palm Beach County. **The purpose of this project is to modify the monitoring frequency and record keeping requirements for HAPs and VOCs. As a result of the recent sale of the Sikorsky Aircraft Corporation (SAC) Division and per the applicant's request, emission units associated with SAC are removed.**

This permit is issued pursuant to Chapter 403.087 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code. Any party to this order (permit) has the right to seek judicial review of it pursuant to Section 120.68, F.S., by filing a notice of appeal pursuant to Rule 9.110 of the Florida Rules of Appellate Procedure with: the legal office of the Department of Health Palm Beach County at P.O. Box 29 (800 Clematis Street), West Palm Beach, Florida 33402-0029; and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days after this order (permit) is filed with the clerk of the Health Department.

*Executed in West Palm Beach, Florida*
DEPARTMENT OF HEALTH PALM BEACH COUNTY

Laxmana Tallam

Laxmana Tallam, P.E., Environmental Administrator
Air and Waste Section

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Notice of Air Construction Permit) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Michael O'Neill, Manager, United Technologies Corporation (michael.oneill@pw.utc.com)
Dean Gee, United Technologies Corporation – Pratt & Whitney Division (Shau.Gee@pwr.utc.com)
Diane Pupa, Florida Department of Environmental Protection, Southeast District (Diane.Pupa@dep.state.fl.us)
Philip D. Cobb, P.E., Golder Associates Inc. (pcobb@golder.com)
Ms. Ana Oquendo, EPA Region 4, Oquendo.Ana@epa.gov
Ms. Natasha Hazziez, EPA Region 4, hazziez.natasha@epa.gov

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Jorge R. Palmi

1-19-2015

***(DATE)***

# FINAL DETERMINATION

**United Technologies Corporation**
**Air Permit No. 0990021-046-AC**

**PERMITTEE:**

United Technologies Corporation
17900 Beeline Highway (SR-710)
Jupiter, FL 33478

**AUTHORIZED REPRESENTATIVE:**

Michael O'Neill, Manager
Assembly, Instrumentation, & Test Operations

**PERMITTING AUTHORITY:**

Florida Department of Health Palm Beach County (Health Department)
800 Clematis Street, 4th Floor
P.O. Box 29
West Palm Beach, FL 33402

**PROJECT:**

Air Permit No. 0990021-46-AC
Air Construction Permit Revision
United Technologies Corporation
The purpose of this project is to modify the monitoring frequency and record keeping requirements for HAPs and VOCs and remove Sikorsky Aircraft Corporation Division emission units as a result of the Division's recent sale.

**NOTICE AND PUBLICATION**

The Health Department distributed a draft air construction permit package on October 23, 2015. The applicant published the Public Notice in the Palm Beach Post on December 22, 2015. The Department received the proof of publication on January 4, 2016. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

**COMMENTS**

On November 12, 2015, the Health Department received the following comments from the applicant. The following summarizes the comments and the Department's response.

**Applicant**

1. **Comment**: "Removal of Emission Units from Permit No. 0990021-47-AV due to Sale of Sikorsky Aircraft Corporation." The applicant requested removal of Emission Units **EU081, EU082, EU083, and EU084**. Additionally, the applicant requested revision of Emission Units EU009, EU010, and EU065 as follows:

   **From:**

| EU No | Emission Unit Description |
|---|---|
| 009 | **Miscellaneous diesel storage tanks** located throughout the facility, including SAC diesel storage tanks:<br>SCC #4-03-010-19: diesel, breathing loss; SCC #4-03-010-21: diesel, working loss<br>*{Permitting Note: The total storage capacity for this group of tanks is 14,280 gallons.}*<br>DL-1AFP: 500 gallon, A-Area<br>DL-1- MFP: 500 gallon, EOB<br>DL-2- MMG: 500 gallon, 2 Generators, K-17 Area - Manufacturing Building<br>DL-7-CFP: 500 gallon, Fire pump, C-10 Area<br>DL-8-ESFP: 500 gallon, Fire pump, C-8 Area<br>DL-10-ENFP: 1000 gallon, Fire pump, C-10 Area<br>DL-16-C11FP: 500 gallon, Fire pump, C-11 Area<br>DL-18-C14FP: 500 gallon, Fire pump, C-12/14 Control<br>DL-22-RTF: 500 gallon, Fire pump, Remote Test Area<br>DL-21-C14G: 50 gallon Generator, C-12/14 Control<br>DL-23-TAB: 5000 gallon, TAB Gas Station<br>DL-1-TABG: 50 gallon, Generator, TAB D-Area<br>DL-1-TMCG: 50 gallon, Generator, TMC-Area<br>DL-23-RTFG: 1000 gallon, Generator, Remote Test Area<br>DL-1-ELSG 50 gallon, Generator, E-Area Control Building Lift Station<br>DL-1-HWG, 75 gallon, Generator, Hazardous Waste Building<br>DL-1-CUG, 160 gallon, Generator, Credit Union & Security Headquarters<br>DL-1-CECG, 50 gallon, Generator, C-Area (Engine Center) Jet Support<br>**DL-1-SPHP1, 515 gallon, Pump 1, Sikorsky Pump House 3**<br>**DL-1-SPHP2, 515 gallon, Pump 2, Sikorsky Pump House 3**<br>**DL-1-SPHP3, 515 gallon, Pump 3, Sikorsky Pump House 3**<br>**DL-1-GTVP1, 275 gallon, Pump 1, Sikorsky GTV**<br>**DL-2-GTVP2, 275 gallon, Pump 2, Sikorsky GTV**<br>**DL-1-GAG, 500 gallon, Generator, Sikorsky Gwinn Airport Control Tower**<br>DL-2-TMC, 200 gallon, TMC Fueling Operations |
| 010 | Miscellaneous jet fuel storage tanks located throughout the facility, including:<br>SCC #4-03-010-16: jet fuel, standing loss; SCC #4-03-010-18: jet fuel, withdrawal loss<br>*{Permitting Note: The total storage capacity for this group of tanks is 2,186,425 gallons. SAC does not have any stationary jet fuel tanks.}*<br>F-1-CFF, 1,000,000 gallon, Jet Fuel Tank<br>F-3-CFF, 150,000 gallon, Jet Fuel Tank<br>F-5-CFF, 1,000,000 gallon, Jet Fuel Tank<br>F-7-A, 10,000 gallon, Salvage Jet Fuel Tank<br>F-37-C11, 275 gallon, Jet Fuel Tank<br>F-39-C14, 275 gallon, Jet Fuel Tank<br>F-40-C12, 275 gallon, Jet Fuel Tank<br>F-41-D, 8,000 gallon, Jet Fuel Tank<br>F-28-R, 10,000 gallon, Jet Fuel Tank<br>**FF-01, 600 gallon, Jet Fuel Tank**<br>**FF-02, 5,000 gallon, Jet Fuel Tank**<br>**PTSB-01, 2,000 gallon, Jet Fuel Tank** |
| 065 | Diesel engines at P&W, and SAC, powering emergency equipment including fire protection pumps, backup generators and cooling water pumps during rocket engine testing.<br>SCC # 2-04-004-02: Thousand gallons of diesel fuel<br>Equipment listed below: |

| EU No | Emission Unit Description | | | |
|---|---|---|---|---|
| | Equipment | Location | Equipment ID# | Associated Tank |
| | Fire Pump | A-Area | C043466 | DL-1-AFP |
| | Fire Pump | EOB | C038806 | DL-1-MFP |
| | Generator | K-17 Area (Detroit Diesel) | C051880 | DL-2-MMG |
| | Generator | K-17 Area (Caterpillar) | C046467 | DL-2-MMG |
| | Fire Pump | C-10 Area | C051454 | DL-7-CFP |
| | Fire Pump | E-8 Area | C051279 | DL-8-ESFP |
| | Fire Pump | E-10 Area | C052350 | DL-10-ENFP |
| | Fire Pump | C-11 Area | C047146 | DL-16-C11FP |
| | Fire Pump | C-12/14 Control | C049074 | DL-18-C14FP |
| | Fire Pump | Remote Test Area | C050190 | DL-22-RTF |
| | Generator | C-12/14 Control | C046467 | DL-21-C14G |
| | Generator | TAB D-Area | 816049 | DL-1-TABG |
| | Generator | TMC Area | C040336 | DL-1-TMCG |
| | Generator | Remote Test Area | C056179 | DL-23-RTFG |
| | Generator | E-Area Control Building | 816154 | DL-1-ELSG |
| | Generator | Hazardous Waste Building | 557370 | DL-1-HWG |
| | Generator | Credit Union & Security Headquarters | 557272 | DL-1-CUG |
| | Generator | C-Area (Engine Center) Jet Support | 557364 | DL-1-CECG |
| | **Fire Pump** | **Sikorsky Pump House 3** | **Pump 1** | **DL-1-SPHP1** |
| | **Fire Pump** | **Sikorsky Pump House 3** | **Pump 2** | **DL-1-SPHP2** |
| | **Fire Pump** | **Sikorsky Pump House 3** | **Pump 3** | **DL-1-SPHP3** |
| | **Fire Pump** | **Sikorsky GTV** | **Pump 1** | **DL-1-GTVP1** |
| | **Fire Pump** | **Sikorsky GTV** | **Pump 2** | **DL-2-GTVP2** |
| | **Generator** | **Sikorsky Gwinn Airport Control Tower** | **S-WPB-EG1** | **DL-1-GAG** |

**To:**

| EU No | Emission Unit Description |
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| Generator | Hazardous Waste Building | 557370 | DL-1-HWG |
| Generator | Credit Union & Security Headquarters | 557272 | DL-1-CUG |
| Generator | C-Area (Engine Center) Jet Support | 557364 | DL-1-CECG |

**Response**: Approved. The requested change is made.

**FINAL ACTION:**

The final action of the Health Department is to issue the permit with the minor changes, corrections nd clarifications described above.

## PERMITTEE

United Technologies Corporation
17900 Beeline Highway (SR-710)ss
Jupiter, FL 33478

Authorized Representative:
Mr. Michael O'Neill, Manager, Assembly, Instrumentation & Test Operations

Air Permit No. 0990021-46-AC
Permit Issued: **January 19, 2016**
Permit Expires: **January 18, 2017**
Air Construction Permit Revision

Revision of Permit 0990021-020-AC to modify the monitoring frequency and record keeping requirements for HAPs and VOCs.

**PROJECT**

This is the final air construction permit, which revises Special Conditions 6.1 and B.4 of Permit No. 0990021-20-AC, which relate to monitoring frequency and record keeping requirements for HAPs and VOCs. This final permit also incorporates comments received from United Technologies Corporation (UTC) on November 12, 2015 informing the Health Department of the sale of its Sikorsky Aircraft Corporation (SAC) Division and requesting removal of Emission Units associated with the SAC Division. United Technologies Corporation is categorized under Standard Industrial Classification No. 3724. UTC's Pratt & Whitney (P&W) Division operates at the existing facility location and performs operations that include aerospace manufacturing, research and development facility, and production testing. The existing facility is located at 17900 Beeline Highway (SR 710), Jupiter, FL 33478 on a 7,000-acre site in rural northwest Palm Beach County, Florida. The UTM coordinates are Zone 17.564.9 km East, and 2977.3.06 km North; **Latitude**: 26° 54' 59" North / **Longitude**: 80° 20' 47" West.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

**STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this FINAL permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Health Palm Beach County, Legal Section, 800 Clematis St. (P.O. Box 29), 4th Floor, West Palm Beach, Florida 33401, Telephone: (561) 837-5900, Fax (561) 837-5295, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

*Executed in West Palm Beach, Florida*
Florida Department of Health Palm Beach County

Laxmana Tallam

Laxmana Tallam, P.E., Environmental Administrator
Air and Waste Section

**FACILITY DESCRIPTION**

The existing facility consists of the following emissions units and activities:

| EU No. | R/U (*/**) | Brief Description |
|---|---|---|
| ***Following emission units are located at Pratt & Whitney (except as noted)*** | | |
| 009 | U | Diesel storage tanks (per Applicant's request, this unit was revised) |
| 010 | U | Jet fuel storage tanks (per Applicant's request, this unit was revised) |
| 012 | U | Jet fuel storage tank (F-8-CFF) |
| 014 | R | Paint spray booth (PS-1-TMC) used for refinishing support equipment |
| 031 | U | Diesel storage tanks (DL-19-SEGF and DL-20-SEGF) |
| 037 | U | AST Gasoline storage tanks |
| 045 | U | Water evaporator (EV-1-MW) |
| 049 | U | Plasma spray booths |
| 059 | U | Air and fuel heaters fired with natural gas |
| 064 | R | Paint spray booth (PSB-1-RTF) |
| 065 | U | Diesel engines powering fire protection pumps and cooling water pumps during engine testing and emergency electrical generators (per Applicant's request, this unit was revised) |
| 069 | U | JP-8 Fueled Jet engine test stands – Test Area A/C |
| 070 | U | Aerospace hand-wiping operations |
| 071 | U | Aerospace spray gun cleaning operations |
| 072 | U | Aerospace flush cleaning operations |
| 073 | U | Aerospace primer and topcoat application operations (PS – 2 – MM) |
| 074 | U | Aerospace waste storage and handling operations |
| 077 | R | Combustion turbine test stands – Fired by Natural Gas |
| 079 | R | Two JP8 fired Turbine Engines powering air compressors used for jet engine tests (RAM Test Facility) |
| 088 | U | Engine Parts Coating Process |
| 089 | U | Hot Acoustic Rig (HAR) at Test Stand B-6. |
| 090 | R | FT4000 Gas Turbine Testing at Test Stand A4 |
| 091 | R | FT4000 Compressor Reciprocating Internal Combustion Engine (RICE) |
| 092 | R | 2100 hp Detroit Diesel Engine (Generator 1A) |
| 093 | R | 2100 hp Detroit Diesel Engine (Generator 1B) |
| 094 | R | 2100 hp Detroit Diesel Engine (Generator 2A) |
| 095 | R | 2100 hp Detroit Diesel Engine (Generator 2B) |
| 096 | R | 2100 hp Detroit Diesel Engine (Generator 3A) |
| 097 | R | 2100 hp Detroit Diesel Engine (Generator 3B) |

| EU No. | R/U (*/**) | Brief Description |
|---|---|---|
| 098 | R | 2100 hp Detroit Diesel Engine (Generator 4A) |
| 099 | R | 2100 hp Detroit Diesel Engine (Generator 4B) |
| 100 | R | 2100 hp Detroit Diesel Engine (Generator 5A) |
| 101 | R | 2100 hp Detroit Diesel Engine (Generator 5B) |
| 102 | R | 2100 hp Detroit Diesel Engine (Generator 6A) |
| 103 | R | 2100 hp Detroit Diesel Engine (Generator 6B) |
| 104 | R | 2100 hp Detroit Diesel Engine (Generator 7A) |
| 105 | R | 2100 hp Detroit Diesel Engine (Generator 7B) |
| 106 | R | A-5 Test Stand |
| ***Following emission units are located at Sikorsky Aircraft Corporation (Per Applicant's request, these units were removed from this permit)*** | | |
| 081 | I | SYK - Spray Booth (PS-14-SIK) for aerospace coating operations [Previously EU 006 in Sikorsky permit] |
| 082 | I | SYK - Spray Booth (PS-16-SIK) for aerospace coating operations [Previously EU 008 in Sikorsky permit] |
| 083 | I | SYK - Boiler (BO-4-SIK) ] fired by natural gas– 2.93 MMBTU/Hr Heat Input [Previously EU 009 in Sikorsky permit] |
| 084 | I | Alodine tank – about 10 gallon capacity |
| ***Following emission unit is used to track VOC emissions from miscellaneous activities at P&W and Sikorsky*** | | |
| 085 | U | Miscellaneous VOC/HAP Emissions Sources |
| ***Following emission units are located at the FIT Center*** | | |
| 086 | R | Fire Innovation and Test Center |
| 087 | R | 810 KW Diesel Generator |

* (R)egulated and (U)nregulated: An unregulated emissions unit is an emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards. Such emissions units and/or activities are neither "regulated nor exempt.

** I = Inactive

**FACILITY REGULATORY CLASSIFICATION**

- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C. for NOx, CO, $SO_2$, and VOC.
- The facility is a Title V synthetic minor source of total and individual HAPs.
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

**PROPOSED PROJECT**

The purpose of this air construction permit is to revise Specific Conditions Specific Conditions 6.1 and B.4 of Construction Permit 0990021-020-AC as follows:

***Specific Condition 6.1 is revised from:***

## SECTION 2. PERMIT REVISIONS

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

**Permit Being Modified: Permit No. 0990021-20-AC**

Affected Emissions Units: Facility-Wide

Section II. Facility-Wide General Conditions, Specific Condition 6.1: This condition is revised as follows.

6.1 Annual HAP Emissions – Recordkeeping: The permittee shall monitor compliance with the HAPs emissions limits, specified in condition 1 of this section, on a monthly basis. If the facility-wide rolling 12-month total emissions do not exceed 80% of the HAPs emission limits as specified, the permittee shall continue to monitor facility-wide HAPs emissions on a monthly basis (rolling 12-month total). If the facility-wide rolling 12 month total emissions do not exceed 25% of the HAPs emission limits as specified, the permittee may monitor facility-wide HAPs emissions quarterly (rolling 12-month total). If the facility-wide rolling 12-month total emissions of HAPs exceed 25% but are less than 80% of the HAPs emission limits as specified, the permittee shall resume monthly monitoring of HAPs emissions. If the facility-wide rolling 12-month total emissions of HAPS exceed 80% of the HAPs emissions limits as specified, the permittee shall monitor facility-wide HAPs emissions on a daily basis (rolling 365-day total). When the facility-wide rolling 365-day total emissions of HAPs do not exceed 80% of the specified HAPS emissions limits for 30 consecutive days, then monthly monitoring of HAPs emissions can be resumed.

The permittee shall maintain and record the following information.

- The individual and total HAP fraction for each solvent/coating material that contains or emits HAPs. If the HAP content is provided by the material supplier or manufacturer as a range, then the permittee must use the upper limit of the range for determining compliance.
- The solvent utilization on a monthly basis for all solvents that contain or emit HAPs.
- The individual and total monthly HAP emissions for each material, calculated from the monthly material utilization and the individual and total HAP fraction, calculated for the preceding month no later than ~~20~~ 25 days after the end of that month.
- For fuel burning units, the monthly emissions of individual HAP and total HAPs shall be estimated based on the monthly fuel usage; and the emissions factor provided by the manufacturer or AP-42 "Compilation of Air Pollutant Emission Factors."
- Using the monthly totals computed in subsection (c) and (d) above, rolling consecutive 12-month total emissions for individual and total HAPs for the entire facility shall be calculated for the previous twelve calendar months.

**[Rule 62-4.070(3), F.A.C.]**

Affected Emissions Units: EU014 and EU064

Section III. Specific Condition B.4: This condition is revised as follows.

B.4 Daily Spray Log: For each day of operation, the permittee shall record the following information in a written log, or an equivalent electronic recordkeeping system, provided records can be generated when requested by the Health Department:

(a) Date of operation;

(b) Identification of each VOC/HAP-containing material used (i.e., paints, thinners, cleaners, resins, adhesives, etc.); and

(c) Quantity of each VOC/HAP-containing material ~~used to nearest tenth of a gallon~~.

**[Rule 62-4.070(3), F.A.C.]**